

EXHIBIT 262

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Gov. U.S. Virgin Islands vs JP Morgan Chase

July 20, 2023

1

1 UNITED STATES DISTRICT COURT FOR THE
2 SOUTHERN DISTRICT OF NEW YORK
3 CASE NUMBER: 22-CV-10904-JSR
4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES)
6 VIRGIN ISLANDS,)
7 Plaintiff,)
8 VS.)
9 JP MORGAN CHASE BANK, N.A.,)
10 Defendant.)
11 -----

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13
14
15 VIDEO RECORDED DEPOSITION OF
16 DENISE GEORGE
17 VOLUME II
18 THURSDAY, JULY 20, 2023

19
20
21 REPORTED BY:

22 DENISE D. HARPER-FORDE
23 Certified Shorthand Reporter (CSR)
Certified RealTime Reporter (CRR)
Certified LiveNote Reporter (CLR)
24 Registered Professional Reporter (RPR)
Notary Public (FLORIDA)

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1 anything. Any other types of contact
2 that would not have anything to do
3 with the litigation and the -- you
4 know the enforcement action against
5 him or against the Estate.

6 Q. Okay. So have you ever spoken
7 with former Attorney General Frazer
8 about Epstein?

9 A. No.

10 Q. Okay. Have you ever spoken
11 with Governor -- former Governor Mapp
12 about Epstein?

13 A. No.

14 Q. And we have already talked
15 about you have spoken of course with
16 Governor Bryan. We talked about that
17 on Monday, correct?

18 A. Yes.

19 Q. Okay. You mentioned that as
20 part of the process that you undertook
21 when you assumed the position of AG
22 was you were curious and you went
23 looking for articles and information
24 about Epstein, correct?

25 ATTORNEY ACKERMAN: Object to

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1 form.

2 THE WITNESS: What I -- that
3 is not entirely what I said, as I
4 indicated. I didn't just start
5 looking for articles on Epstein.

6 Once I came on board as
7 Attorney General in April, there was a
8 lot of media allegations or reports
9 and everything from the media.

10 Even inquiries from the media
11 with respect to allegations and
12 reports of misconduct, sex trafficking
13 and those things by Mr. Epstein on
14 Little St. James island.

15 And that allegations had been
16 going on for many years and a lot of
17 victims of this sex trafficking and
18 it's sex -- sexual exploitation.

19 These are reports that were
20 coming from the media, even members of
21 the media would be -- would have been
22 calling, and even before I got there.
23 And I was advised when I got there
24 that this was -- that there had been a
25 lot of inquiries with respect to that

1 issue about, you know, Epstein's
2 misconduct in the sex trafficking
3 operation occurring on Little St.
4 James.

5 So having heard all of that --
6 of course it was all what I consider
7 hearsay, because you know it comes
8 from just reports from the media and
9 everything. I was of course
10 interested in looking because the
11 allegations were really horrific.

12 So I then started to really
13 not only inquire about whether we have
14 solid complaints. But I started to
15 really -- you know just research, read
16 the news -- read the news articles,
17 media. As well as reports from
18 regarding Courts and Court documents
19 that were available just to study and
20 to get a background. And get a gist
21 of you know just whether or not you
22 know there's anything credible or
23 anything that occurred with respect to
24 this, to actually understand what went
25 on.

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1 E-mail, and then the second is the
2 attachment to it.

3 A. Oh, okay.

4 ATTORNEY O'LAUGHLIN: In fact,
5 Madam Court Reporter, if we could
6 enter it as a single exhibit, that
7 might be better, but defer to -- defer
8 to you.

9 THE WITNESS: Okay.

10 (BY ATTORNEY O'LAUGHLIN) :

11 Q. Do you know who Jason Marsh
12 is?

13 A. Yes. Jason Marsh is a law
14 enforcement officer. I think when I
15 became Attorney General in 2019, he
16 may have been acting police
17 commissioner at the time before
18 Governor Bryan appointed a police
19 commissioner.

20 Q. Okay. So Jason Marsh is
21 sending a PDF scan he's made of the
22 Virgin Islands Daily News source with
23 the title "Lawmakers issue call for
24 investigation of Epstein deal."

25 Do you see that?

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1 ATTORNEY ACKERMAN: Object to
2 form, foundation.

3 THE WITNESS: Give me a
4 second. Okay. I see the second --
5 page 2?

6 ATTORNEY O'LAUGHLIN: Yeah.

7 THE WITNESS: I'm looking at
8 page 2 in 9. That's -- that's dated
9 Saturday, December 8th, 2019.

10 ATTORNEY O'LAUGHLIN: Yes.

11 THE WITNESS: I mean 2018.

12 THE WITNESS: Okay. Yes, I'm
13 seeing it.

14 (BY ATTORNEY O'LAUGHLIN) :

15 Q. And there's a paragraph that's
16 in the fourth column in from the left
17 that starts with the words "The
18 Herald's examination"?

19 A. Okay. It says, "The Herald's
20 examination," yes.

21 Q. So it says, "The Herald's
22 examination of thousands of court
23 records, E-mails and FBI records also
24 showed that after the deal was struck,
25 it effectively shut down an ongoing

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1 is, but I don't know her. I didn't
2 even know her at this time.

3 Q. Okay. So this is the first --
4 this letter that you received is the
5 first time you had interacted with
6 her?

7 A. Yes. I believe though that I
8 may have been introduced to her a
9 couple of years ago, before I was even
10 an AG at the -- but I'm not -- I'm not
11 sure. I think she was in a group of
12 people. But other than that, I've
13 never had any contact with her or
14 anything.

15 Q. Okay. And what was the reason
16 for the outreach?

17 A. The reason for this?

18 Q. Uh-huh.

19 A. Well, as per Governor Bryan
20 telling me that you know Jeffrey
21 Epstein wants to have this waiver of
22 the travel requirements, and that he
23 said that his attorneys will be
24 contacting me, and encouraged me to
25 meet with the attorneys to consider

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1 it.

2 I -- this must be the
3 follow-up letter. In this letter in
4 their is a letter where she is
5 requesting on behalf of Jeffrey
6 Epstein for a waiver and for -- as she
7 indicated, a reinstatement of the
8 waiver that Attorney Vincent Frazer
9 had entered years ago, years before.

10 And I suppose a revocation of what
11 Thomas-Jacobs did. So she went
12 through that whole thing about what
13 was done.

14 Q. Were you aware of what the
15 previous conditions granted by
16 Attorney Frazer were?

17 A. At this point I was, because
18 in anticipation of -- you know after
19 speaking with the Governor, I had
20 gotten -- as I indicated, I went to
21 the Deputy Attorney General, Attorney
22 Jacobs, to get that briefing, the
23 background.

24 And it was in getting that
25 from Attorney Jacobs, that yes, that

1 answer.

2 A. Oh, okay. I said that I'm not
3 looking for any specific documents
4 because I'm not. I don't know what to
5 look for. You need to know what the
6 proof is. You know, because I looked
7 at this, and it seems sort of silly to
8 me because, you know, it's like you're
9 making a motion -- it's like making a
10 motion before the court and then
11 asking the judge, Can you tell me,
12 judge, what I need to produce in order
13 to prove this so you can grant it.

14 I mean, it's -- whatever is
15 the proof that they have, only they
16 can have it. I don't have it. But if
17 they can't find proof that he has
18 engaged, or he has to be engaged in
19 legitimate business, or for legitimate
20 business purposes internationally to
21 the -- to the level that he is going
22 to need a waiver of the travel
23 requirements. It's only for them to
24 know what that is.

25 And if they don't have it,

1 then they don't have it. But I just
2 wanted to make it clear that that's
3 the only way that I'm going to
4 consider a request if they submit
5 that proof. And if you don't know
6 what that -- those documents are to
7 prove that, that's -- it seemed to me
8 that, well, maybe you don't have it.

9 But I'm not going to answer
10 that question like what specific
11 things that you need when I don't
12 know. That's for her to do. That's
13 for the -- for Jeffrey Epstein to
14 do --

15 Q. And --

16 A. -- submit that proof.

17 Q. And prior to receiving this
18 E-mail, you had looked through
19 Epstein's sex offender registration
20 file to see if there was any
21 reasonable and reliable proof;
22 correct?

23 A. Based on what was in there.
24 Based on what was in there, I saw
25 nothing that convinced me that there

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1 was any reasonable or reliable proof.

2 You know, nothing satisfied me with
3 respect to that that would have
4 warranted or justified any waiver.

5 So as it was, that's why my
6 decision was no, that I would not do
7 it unless proof is shown. But nothing
8 was shown there. And I just had to
9 make it clear that unless they show
10 that, show proof and submit proof, I'm
11 not going to even consider it much
12 less act favorably on the request
13 irrespective -- and I said I realized
14 there was some political maneuvering
15 that he was doing. Just the fact that
16 he as a sex offender got the Governor
17 to come to me for that request, which
18 is unusual. Which I imagine is
19 unusual because a sex offender just
20 goes and applies to the Attorney
21 General directly if they want some
22 kind of a waiver.

23 So I know that was in play,
24 and I just wanted to again let them
25 know and reiterate that the only thing

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1 it is not so much a problem. Using
2 his political influence is what it
3 appeared to me that Jeffrey Epstein
4 was doing, was trying to use political
5 influence that he may have had with
6 the Governor in order to boost or help
7 me to rule favorably. And that's what
8 I was thinking at the time.

9 And so it just -- my position
10 was just to make sure that he knows
11 that is not happening. I would not be
12 a part of that, and to let him know
13 what he'll need to submit.

14 (BY ATTORNEY O'LAUGHLIN) :

15 Q. What led you to think that
16 Epstein was exerting political
17 influence?

18 A. Well, I think --

19 ATTORNEY ACKERMAN: Object to
20 form.

21 THE WITNESS: Well, for me
22 what -- what led me to think that is
23 just the fact that the Governor
24 approached me on behalf of him
25 requesting -- about this request

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1 saying that he requested it, that --
2 that alone. Because not every sexual
3 offender or any person, you know, are
4 in the position to have the Governor
5 make the request to the Attorney
6 General rather than just coming and
7 making it on their own directly to the
8 Attorney General.

9 That by itself indicated to me
10 that he was flexing his political
11 influence over or with the Governor in
12 an effort to get a favorable result in
13 what I considered to be definitely a
14 law enforcement issue by the Attorney
15 General.

16 And so that's what --
17 certainly just that alone raised that
18 red flag. And then the subsequent
19 reminder coming from the Governor, not
20 by Attorney Kellerhals and not by
21 Jeffrey Epstein. But coming from the
22 Governor to remind me that I have to
23 make or I need to make a decision on
24 Epstein, that also indicated to me
25 definitely that they're using that

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1 political influence or that there --
2 that there is or there exists some
3 degree of political influence that
4 Epstein is willing to use through the
5 Governor.

6 Because even then, you know,
7 the question is why is this a
8 priority? Well, maybe to show that
9 this is the Governor's priority or
10 some -- for some reason.

11 But to answer your questions,
12 those are what was in my mind that
13 made it clear to me that he is
14 exercising some kind of political
15 power in order to get a certain result
16 from me with respect to applying the
17 laws here.

18 (BY ATTORNEY O'LAUGHLIN) :

19 Q. Did you think that the
20 outreach by the Governor on behalf of
21 Epstein was improper?

22 ATTORNEY ACKERMAN: Object to
23 form.

24 THE WITNESS: I do.

25 (BY ATTORNEY O'LAUGHLIN) :

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1 Q. Why?

2 A. My thoughts about that even
3 then, in particular then, it did not
4 sit right with me. Because my thing
5 is, first of all, why is the Governor,
6 you know, getting involved in this
7 matter that is a law enforcement
8 matter. Or only the Attorney General
9 to make based on law, and that he was
10 doing so on behalf of a convicted sex
11 offender, a sexual offender, child
12 predator, this person, Jeffrey --
13 Jeffrey Epstein.

14 That was troubling to me. I
15 didn't go much further than that, but
16 that was definitely troubling to me --

17 Q. Were there --

18 A. -- that he made -- he said it
19 will come in, and I would --
20 definitely the request came in, and
21 then I did just as any request would
22 come. I waited until the request came
23 from the attorney, and then I
24 responded once that -- a request came,
25 properly came.

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1 Q. You testified on Monday that
2 there were several other outreaches by
3 the Government -- by the Governor
4 involving Epstein, correct?

5 A. Pre-litigation there was just
6 that additional reminder on May 14th
7 that was a text reminder regarding the
8 sex offender registry where he said
9 you must -- you need to make a
10 decision on Epstein.

11 Q. So were --

12 A. So I -- but yeah.

13 Q. So were there any other
14 outreaches of a similar nature from
15 the Governor?

16 ATTORNEY ACKERMAN: Object to
17 form. And hold on because there's
18 privilege issues here. Are you
19 talking about pre-litigation or
20 post-litigation?

21 ATTORNEY O'LAUGHLIN:
22 Pre-litigation.

23 ATTORNEY ACKERMAN: Yeah,
24 pre-litigation, okay.

25 THE WITNESS: And you're

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1 complete my testimony with respect to
2 the communications with the Governor
3 regarding the sex offender registry
4 issue.

5 Q. Okay.

6 A. So that letter -- the date
7 that letter was sent, that E-mail
8 correspondence was sent to Attorney
9 Kellerhals and Attorney Rivers, I also
10 sent one to Governor Bryan, a similar
11 one.

12 But just explaining to him the
13 -- what the laws are, and that there
14 is a requirement that he comply with
15 providing proof. And that my decision
16 was until that proof was provided,
17 that I would not be able to
18 consider -- I would not consider, you
19 know, any waiver.

20 I also indicated to him that
21 -- the reasons for it and the reasons
22 -- the reasons -- that the reason or
23 the purpose behind the statute. And
24 that it's there to protect the
25 community and the importance of that.

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1 And I did that just so that,
2 you know, that he can have an
3 understanding. I felt that he needed
4 an understanding as to the importance
5 and the magnitude of that requirement.

6 And then he just responded,
7 well, thank you for your -- well,
8 I'm seeing what his response is. But
9 he was just -- he just said, Well,
10 thank you for your work on this. And
11 after that, there was nothing.

12 Q. And the response from the
13 Governor, was that in E-mail form as
14 well?

15 A. Yes. That was E-mailed to
16 me.

17 Q. Okay. Was anyone copied on
18 that E-mail?

19 A. No.

20 Q. Do you still have a copy of
21 that E-mail?

22 A. I might have a printed
23 version, but -- I might.

24 Q. Okay. Was this request that
25 you received from the Governor, were

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1 occurred soon after I came on. So in
2 that sense, probably around the same
3 time.

4 (BY ATTORNEY O'LAUGHLIN) :

5 Q. And so did that background
6 research and investigation you were
7 doing into Epstein impact the way in
8 which you viewed the Governor's
9 request to you?

10 ATTORNEY ACKERMAN: Object to
11 form.

12 THE WITNESS: No, I wouldn't
13 say that impacted it. Just the fact
14 that the request was made on behalf of
15 Jeffrey Epstein, a sex offender,
16 through the Governor instead of the
17 regular channels was -- was mainly
18 what was concerning with respect to
19 that.

20 (BY ATTORNEY O'LAUGHLIN) :

21 Q. Right. But weren't you
22 finding through your own research that
23 he wasn't just a registered sex
24 offender. There seemed to be a lot
25 more information out there about his

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1 misconduct, correct?

2 A. Well --

3 ATTORNEY ACKERMAN: Object to
4 form.

5 THE WITNESS: Well, there were
6 allegations, yes, definitely.

7 Allegations of what happened before.

8 Remember, he's not just a registered
9 sex offender. He's a convicted child
10 -- a child molester, a predator. I
11 don't -- you know, so that was in and
12 of itself sufficient to raise concern
13 for me.

14 The fact that all of this
15 other stuff was coming in, I'm still
16 in the process of processing it,
17 actually, and looking it up and all of
18 that. It may have -- you know, at the
19 time maybe it was part of why I wanted
20 to make sure that it's legitimate
21 business.

22 And I didn't see that, you
23 know, anything -- any proof that the
24 business would have -- was legitimate.
25 And that's why I was looking for that

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1 specific information that there would
2 be legitimate purposes for him to want
3 to go to these countries.

4 (BY ATTORNEY O'LAUGHLIN) :

5 Q. So you were particularly
6 sensitive to a request regarding
7 Epstein from the Governor because at
8 the same time you were seeing all of
9 this reporting through your own
10 investigation, correct?

11 A. I wouldn't say --

12 ATTORNEY ACKERMAN: Objection

13 --

14 THE WITNESS: -- that it was
15 --

16 ATTORNEY ACKERMAN: Hold on,
17 Attorney George.

18 Objection to form, misstates
19 prior testimony, argumentative.

20 THE WITNESS: Yeah, I didn't
21 say I was particularly sensitive with
22 respect to that. It was just -- just
23 that just coming from the Governor a
24 request of Jeffrey Epstein that was --
25 that should have come directly to the

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1 Attorney General.

2 But going towards him, he gave
3 me the impression that he was using
4 political influence to try to get a
5 result, a favorable result that he
6 wanted.

7 Any other -- even if it was
8 another sex offender and the Governor
9 came to me, I would have been like um,
10 you know, because it -- the correct
11 channels would be, well, go and, you
12 know, you make your request to the
13 Attorney General's Office.

14 (BY ATTORNEY O'LAUGHLIN) :

15 Q. Were there any other instances
16 of the Governor reaching out regarding
17 Epstein through what you viewed as the
18 incorrect channels?

19 ATTORNEY ACKERMAN: Object to
20 form and -- object to form. You can
21 answer.

22 THE WITNESS: Yeah. This
23 sounds like the question you asked me
24 before we went on break. I don't know
25 if it's any different. But as I was

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1 saying, that there was -- I don't
2 recall any conversation or anything
3 where the Governor reached out since
4 that, you know, last communication.
5 And which is why I indicated there was
6 a response to my letter to him that
7 ended the communication. Nothing else
8 after that pre-litigation.

9 (BY ATTORNEY O'LAUGHLIN) :

10 Q. Did the position that you took
11 in response to the Governor's request
12 regarding Jeffrey Epstein's sex
13 offender monitoring impact your
14 standing with the Governor?

15 ATTORNEY ACKERMAN: Object to
16 form.

17 THE WITNESS: At that time I
18 don't know with respect to how he
19 perceived it, but his response to
20 my decision was just thank you for the
21 work you did on it, and that's it.

22 (BY ATTORNEY O'LAUGHLIN) :

23 Q. Knowing what you know now, do
24 you think it impacted your standing?

25 ATTORNEY ACKERMAN: Objection

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1 to form.

2 THE WITNESS: I believe at the
3 beg- -- I believe it's likely.

4 (BY ATTORNEY O'LAUGHLIN) :

5 Q. Why?

6 ATTORNEY ACKERMAN:

7 Objection.

8 THE WITNESS: It's likely that
9 it did because I was doing something
10 where I was, you know, doing my work
11 and doing my job without respect to
12 any political interference or
13 anything. And he did not ask -- he
14 did not tell me what decision to make,
15 but at the same time for whatever -- I
16 don't know how it would have impacted
17 him.

18 But I think that it could have
19 because I am always determined to
20 stand for what it is that I believe is
21 right based on my -- on my position as
22 to having make law enforcement
23 decisions. And I make them
24 irrespective of anything as far as who
25 the people are or what -- or whatever

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1 political influence or power they may
2 have.

3 And maybe that might have been
4 the first time that he might have been
5 faced with that. I don't know what
6 his response was, but I will say that
7 it could be very well the beginning of
8 -- of that and it could have impacted
9 it.

10 (BY ATTORNEY O'LAUGHLIN) :

11 Q. Do you think that your
12 approach of standing for what is right
13 impacted your career as the Attorney
14 General of the USVI?

15 ATTORNEY ACKERMAN: Objection.
16 No. Objection. This is well outside
17 the scope. This has no relation to
18 the topics. I am instructing the
19 witness not to answer. This has
20 nothing to do with the sex offender
21 registry.

22 ATTORNEY O'LAUGHLIN: Okay.
23 Let's go to the Court, David.

24 ATTORNEY ACKERMAN: Let's go
25 what?